

# Exhibit C



*United States Attorney  
Northern District of California*

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August 1, 2022

**By E-mail to Defense Counsel**

Michael Shepard  
Amy Hitchcock  
Luke Roniger  
King & Spaulding  
50 California Street  
Suite 3300  
San Francisco, CA 94111

Re: United States v. Rowland Marcus Andrade  
No. 20-CR-00249 RS

Dear Counsel:

I write in response to your May 10, 2022 letter. We have researched each of your discovery requests. I respond to each of your numbered requests below:

*Brady* Requests

1. The FBI had no independent communications with Abbe Lowell. Any communications between Mr. Lowell and members of the U.S. Attorney's Office will be produced in advance of trial to the extent they are discoverable under *Brady* or another relevant rule or statute.
2. The government is unaware at this point of any privilege log ever created by the FBI relating to items from Jack Abramoff's phone.
3. The government has already turned over all reports related to UCEs, including those who monitored accounts on telegram and Chainbook. Those UCE reports can be found at FBI-UC-000001-104. The government is unaware of any other reports related to UCEs. To the extent defense counsel's request includes the identity of any UCEs, that information is not discoverable.

4. All communications and screenshots that the government is aware of and which are responsive to this request have been produced, including but not limited to the production at FBI-UC-000038-43.
5. Other than what has already been produced, the government is not aware at this time of any documents regarding agreements with Comply Advantage or Global Visions Solutions. The government did not subpoena any records directly from either entity.
6. The government is not aware at this time of any transaction monitoring data that was taken from Comply Advantage.

#### Other Discovery Requests

1. The government searched and is not aware of any audio/video recordings of an interview with Warren Cully.
2. The government searched and is not aware of any audio/video recordings of an interview with Mark DiAdamo.
3. The FBI is not aware that it has any recordings of communications between Mr. Andrade and his attorneys in its possession.
4. The “recordings” mentioned in this request are, in fact, pen register data and not recordings. The government has produced that data. Please let us know if you cannot access it.
5. The government is aware of the following search warrants that are responsive to your request:

<b>Date SW signed by judge</b>	<b>Subject</b>	<b>Search Location</b>	<b>Bates Range</b>
9/28/2018	Jack Abramoff	812 Edelblut Dr., Silversprings, MD	USAO-0000074-162
9/13/2018	Marcus Andrade	7495 W. Azure Dr. STE 110, Las Vegas, NV	Not yet produced
9/19/2018	Japheth Dillman	3563 Pierce St. San Francisco, CA	FBI-MAIN-0000840
5/12/2019	John Bryan	<a href="mailto:jbryan@watley.com">jbryan@watley.com</a>	FBI-302-005128
7/31/2019	Marcus Andrade	<a href="mailto:CEO@AMLBITCOIN.COM">CEO@AMLBITCOIN.COM</a>	USAO-0000047-73
3/10/2020	Marcus Andrade	9414 Plaza Point Dr. Missouri City, Texas	FBI-00029572-625
3/12/2020	Marcus Andrade	7324 Southwest Freeway, Suite 600 Houston, Texas	FBI-00029513-571

The search warrant for the W. Azure Drive address is in the physical file, and will be produced shortly.

6. All communications and screenshots that the government is aware of and which are responsive to this request have been produced, including but not limited to the production at FBI-UC-000038-43.
7. The government did not seize and download Mr. De La Guardia's phone as part of this investigation, so it does not have text messages from his phone. To the extent there were messages on Mr. Andrade's phone with Mr. De La Guardia, those messages have been produced along with the rest of the contents of Mr. Andrade's phone.
8. The government understands that Mr. Andrade offered to upload materials to FBI SA Quinn but never did so. The government checked with the vendor of the cloud-based site and confirmed that no upload ever occurred. This conversation is reflected in an FBI 302 produced at FBI-302-005032.
9. The government does not produce the form letters sent to victims. To the extent the government has received any responses, including from the individuals named in this request, it will produce them at an appropriate time before trial pursuant to its *Jencks* obligations or other discovery rules.
10. All documents that the government is currently aware of relating to any undercover operation involving Mr. Andrade have already been produced.

Please contact me if you have any questions concerning the foregoing.

Very truly yours,

STEPHANIE M. HINDS  
United States Attorney

/s/  
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ANDREW F. DAWSON  
ROSS WEINGARTEN  
Assistant United States Attorneys